LacoutureRuesterholz MD Decl. ¶ 264; LacoutureRuesterholz DC Decl. ¶ 253; LacoutureRuesterholz WV Decl. ¶ 249.

Directory Assistance. Verizon provides directory assistance services in Maryland, the District, and West Virginia in the same way that it does in its 271-approved states. See Lacouture/Ruesterholz MD Decl. ¶ 269; Lacouture/Ruesterholz DC Decl. ¶ 258; LacoutureRuesterholz WV Decl. ¶ 254; Virginia Order ¶ 189 (finding that Verizon's provision of directory assistance satisfies the Act); Pennsylvania Order ¶ 120 (same); New Hampshire/Delaware Order ¶ 135 (same); New Jersey Order ¶ 164 (same); Massachusetts Order ¶ 222 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same). Competing carriers have the option **of** purchasing directory assistance directly from Verizon, or they can rely on their own directory assistance centers and use Verizon's or a third party's directory assistance database. See LacoutureRuesterholz MD Decl. ¶ 270; LacoutureRuesterholz DC Decl. ¶ 259; LacoutureRuesterholz WV Decl. ¶ 255.[55]

Through September 2002, 14 carriers were purchasing directory assistance services from Verizon using approximately 450 dedicated OS/DA trunks in Maryland, 14 carriers were purchasing directory assistance using approximately **700 trunks** in the District, and two CLECs were purchasing directory assistance using approximately 30 trunks in West Virginia. See Lacouture/Ruesterholz MD Decl. ¶ 271; LacoutureRuesterholz DC Decl. ¶ 260;

[55] For CLECs that establish their own directory assistance centers, Verizon provides nondiscriminatory access to its directory assistance listings. See LacoutureRuesterholz MD Decl. ¶ 276; LacoutureRuesterholz DC Decl. ¶ 265; Lacouture/Ruesterholz WV Decl. ¶ 261. Verizon allows CLECs to use Direct Access to Directory Assistance, a database service that provides read-only access to Verizon's directory assistance listings. See LacoutureRuesterholz MD Decl. ¶ 276; LacoutureRuesterholz DC Decl. ¶ 265; Lacouture/Ruesterholz WV Decl. ¶ 261. Verizon also makes the contents **of** its directory assistance database available to CLECs in an electronic format **for** their use in providing local directory assistance services. See LacoutureRuesterholz MD Decl. ¶ 277; Lacouture/Ruesterholz DC Decl. ¶ 266; Lacouture/Ruesterholz WV Decl. ¶ 262.

LacoutureRuesterholz WV Decl. ¶ **256.** As **of** that same date, another **66** competing carriers in Maryland, **44** in the District, and **27** in West Virginia were purchasing directory assistance service using shared transport. See LacoutureRuesterholz MD Decl. ¶ 271; Lacouture/Ruesterholz DC Decl. ¶ **260;** LacoutureRuesterholz WV Decl. ¶ **256.**

Verizon provides trunks to competing carriers for directory assistance in the same manner it provides interconnection trunks generally. See Lacouture/Ruesterholz MD Decl. ¶ **272;** LacoutureRuesterholz DC Decl. ¶ 261 ;LacoutureRuesterholz WV Decl. ¶ **257.** Moreover, when CLECs purchase Verizon's directory assistance services, they have their choice **of** branding options, and calls from CLEC customers are handled in a nondiscriminatory **fashion** and answered as quickly as calls from Verizon's own customers. See LacouturelRuesterholz MD Decl. ¶¶ **275,279;** LacoutureRuesterholz DC Decl. ¶¶ **264,268;** LacoutureRuesterholz WV Decl. ¶ **264.**

Operator Services. Verizon likewise provides access to its operator services in Maryland, the District, and West Virginia using the same processes and procedures that it uses in its **271-**approved states. See LacoutureRuesterholz MD Decl. ¶ 280; Lacouture/Ruesterholz DC Decl. ¶ **269;** LacoutureRuesterholz WV Decl. ¶ 265; Virginia Order ¶ **189** (finding that Verizon's provision **of** operator services satisfies the Act); Pennsylvania Order ¶ **120** (same); New Hampshire/Delaware Order ¶ 135 (same); New Jersey Order ¶ **164** (same); Massachusetts Order ¶ **222** (same); Rhode Island Order ¶ **97** (same); Vermont Order ¶ **59** (same); Maine Order ¶ **52** (same). Competing carriers again have the option either to purchase operator services from Verizon **or** to rely on their own centers. See LacoutureRuesterholz MD Decl. ¶ **281;** Lacouture/Ruesterholz DC Decl. ¶ **270;** LacoutureRuesterholz WV Decl. ¶ 266.

Through September 2002, 14 carriers were purchasing operator services from Verizon using approximately 450 dedicated OS/DA trunks in Maryland, 14 carriers were purchasing operator services using approximately 700 trunks in the District, and two CLECs were purchasing operator services using approximately 30 trunks in West Virginia. See LacoutureRuesterholz MD Decl. ¶ 283; LacoutureRuesterholz DC Decl. ¶ 272; LacoutureiRuesterholz WV Decl. ¶ 268. As of that same date, another 66 competing carriers in Maryland, 44 in the District, and 27 in West Virginia were purchasing operator services using shared transport. See LacoutureRuesterholz MD Decl. ¶ 283; Lacouture/Ruesterholz DC Decl. ¶ 272; LacoutureiRuesterholz WV Decl. ¶ 268.

As with directory assistance, Verizon provides trunks to competing carriers that provide their own operator services in the same time and manner and in the same intervals as it provides interconnection trunks generally. See Lacouture/Ruesterholz MD Decl. ¶ 284; LacoutureiRuesterholz DC Decl. ¶ 273; LacoutureRuesterholz WV Decl. ¶ 269. Moreover, when CLECs purchase Verizon's operator services, they have their choice of branding options, and Verizon's performance in handling calls from CLEC customers in a timely manner is even better than the standards established in the Carrier-to-Carrier guidelines. See Lacouture/Ruesterholz MD Decl. ¶¶ 286, 288; LacoutureRuesterholz DC Decl. ¶¶ 275, 277; LacoutureRuesterholz WV Decl. ¶¶ 271, 273.

E. White Pages Directory Listings (Checklist Item 8).

Verizon provides access to its white pages directory listings in Maryland, the District, and West Virginia in the same manner as it does in its 271-approved states. See LacoutureiRuesterholz MD Decl. ¶ 289; Lacouture/Ruesterholz DC Decl. ¶ 278; LacoutureRuesterholz WV Decl. ¶ 274; McLean/Webster Decl. ¶ 91; Virginia Order ¶ 153 (finding that Verizon's provision of white pages directory listings satisfies the checklist);

Pennsylvania Order ¶¶ 14-117 (same); New Hampshire/Delaware Order ¶ 135 (same); New Jersey Order ¶ 156 (same); Massachusetts Order ¶ 222 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same).

Competing carriers in all three jurisdictions use Verizon's white pages directory listings extensively: through September 2002, Verizon has provided competing carriers in Maryland with more than 215,000 basic white pages directory listings, including approximately 134,000 for residential customers. See LacoutureRuesterholz MD Decl. ¶ 295. As of that same date, Verizon has provided competing carriers in the District with more than 51,500 basic white pages directory listings, including 36,700 for residential customers. See Lacouture/Ruesterholz DC Decl. ¶ 284. In West Virginia, Verizon has provided competing carriers with more than 32,000 basic white pages directory listings, including approximately 12,000 for residential customers. See LacoutureRuesterholz WV Decl. ¶ 280.

Verizon has procedures in place to ensure that the directory listings of CLEC customers are included in Verizon's database on an accurate, reliable, and nondiscriminatory basis. See LacoutureRuesterholz MD Decl. ¶¶ 291-294; LacoutureRuesterholz DC Decl. ¶¶ 280-283; LacoutureRuesterholz WV Decl. ¶¶ 276-279.[56] In fact, Verizon provides CLECs in all three jurisdictions with several means of verifying their customers' listings prior to publication. See LacoutureRuesterholz MD Decl. ¶ 289; LacoutureRuesterholz DC Decl. ¶ 278; LacoutureRuesterholz WV Decl. ¶ 274; McLean/Webster Decl. ¶¶ 104-107. These include a listings verification report that Verizon provides prior to the service order close date and the

[56] For example, Verizon commingles the listings of CLECs' customers alphabetically with Verizon's own customers, using the same typeface and format and with no distinguishing features. See LacoutureRuesterholz MD Decl. ¶ 291; Lacouture/Ruesterholz DC Decl. ¶ 280; LacoutureRuesterholz WV Decl. ¶ 276. Verizon enters CLECs' listings using the same procedures as for its own listings. See McLean/Webster Decl. ¶ 91.

ability to review published listings in real time **through** a Web GUI. See McLean/Webster Decl. ¶¶ 105-107.[57] In addition, as the Commission has recently found, "Verizon has already implemented numerous system improvements that demonstrate Verizon's ability to provide nondiscriminatory access to directory listings . . . and has demonstrated a commitment to fix any unanticipated future problems that may arise." Virginia Order ¶ 153. These improvements include "a quality verification process for manually processed directory listing orders," id. ¶ 157; "a system fix to reduce the possibility of human error when a competitive LEC is conducting a migration of a Verizon retail end user," id. ¶ **158;** making available "an electronic form of the LVR which, unlike the old format, can be imported into a database, and is sortable by various fields to ease in reviewing the accuracy of a competitive LECs' listings," id. ¶ 163; and "conduct[ing] several education worksbops and training sessions specifically designed to educate and assist competitive LECs in the submission **of** accurate directory listing LSRs," id. ¶ 164.[58]

---

[57] During the state proceedings in Maryland, the District, and West Virginia, AT&T claimed **(as** it did in connection with Verizon's long distance application for Virginia) that the LVR process improperly requires CLECs to assume responsibility for verifying Verizon's input to the directory listings database. See McLean/Webster Decl. ¶ **109.** But the Commission has already found that "Verizon's use of the LVR is reasonable." Virginia Order ¶ 168. Moreover, CLECs have options other than the LVR process for verifying the accuracy of their directory listings. See McLean/Webster Decl. ¶¶ 104-107; Virginia Order ¶ 168 ("The LVR is only one additional tool that Verizon makes available **as** an option to competing carriers. . . . [T]he creation of the LVR has not been Verizon's only response to the problem"). Indeed, Verizon's data show that AT&T has not submitted any LVR "discrepancies" in 2001 or 2002, which suggests either that all of AT&T's listings have been processed correctly, or that AT&T has declined to review the LVR. See McLean/Webster Decl. ¶ 109.

[58] In West Virginia, Verizon took several additional steps to address the concerns raised by two CLECs regarding errors in their directory listings. See McLean/Webster Decl. ¶ 110. It held up publication of several upcoming books until it was able to investigate the CLECs' claims, and then took steps to correct erroneous listings within those books. See id. **As** it turned out, the number of errors discovered in these four books was extremely small — 114 out of more than 11,000 total CLEC listings. See id. ¶ 111. Some of these errors appear to have been caused by CLECs reviewing and modifying their listings simultaneously with Verizon at the time of the order-confirmation process. See id. ¶ 112. Verizon has accordingly instructed CLECs to review their listings at a later stage in the provisioning process to avoid the potential for Verizon and

Of course, these improvements were made in Maryland, the District, and West Virginia at the same time they were made in Virginia, because all four jurisdictions use the same underlying OSS.

Verizon's performance has been strong under measurements designed to measure the accuracy with which Verizon provides directory listings to CLECs in the jurisdictions in which Verizon has begun reporting under these measurements. See McLean/Webster Decl. ¶ **102. As** the Commission has recognized, Verizon has developed measurements that track the accuracy with which Verizon translates listing information from LSRs submitted by CLECs to service orders. See id Virginia Order ¶ 160. Verizon began reporting its performance in the District beginning with the September reporting month, and expects to begin reporting under these measurements in Maryland beginning with the November **2002** reporting month, and in West Virginia beginning with the January **2003** reporting month. See McLeadWebster Decl. ¶ 102. In the District, Verizon's reported accuracy under these measurements was more than 96 percent in September and nearly 96 percent in October. See id. Verizon's performance under these measurements also has remained strong in Virginia. From August through October **2002,** Verizon's reported accuracy under these measurements in Virginia ranged from **96** percent to over **98** percent. See id.

In addition, Verizon has performed a special study in Virginia to address the "latter half of the directory listing submission process that compare[s] the accuracy between the service order information and the data contained in" the systems of Verizon's directory company (Verizon Information Services). See Virginia Order ¶ 161; McLeadWebster Decl. ¶ **103.** The results of this study for August and September **2002** demonstrate that **the** match rate between the

---

CLECs to make conflicting changes to listings. See id.

Administration System with the information in the Local Exchange Routing Guide to ensure that Verizon's information is accurate. See LacoutureRuesterholz MD Decl. ¶ 300; Lacouture/Ruesterholz DC Decl. ¶ 289; LacoutureRuesterholz WV Decl. ¶ 285.

G. Databases and Associated Signaling (Checklist Item **10).**

Verizon provides competing carriers in Maryland, the District, and West Virginia with access to its databases and signaling using the same nondiscriminatory processes and procedures that it uses in its 271-approved states. See LacoutureRuesterholz MD Decl. ¶ 301; Lacouture/Ruesterholz DC Decl. ¶ 290; LacoutureRuesterholz WV Decl. ¶ 287; Virginia Order ¶ 193 (finding that Verizon's provision of databases and signaling satisfies the checklist); Pennsylvania Order ¶ 120 (same); New Hampshire/Delaware Order ¶ 135 (same); New Jersey Order ¶ 164 (same); Massachusetts Order ¶ 222 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same).

Through September 2002, Verizon was providing nine CLECs in Maryland, seven CLECs in the District, and one CLEC in West Virginia with access to its SS7 signaling network through its federal access tariff offering, although no CLEC has requested unbundled access to Verizon's signaling network in any of the three jurisdictions. See LacoutureRuesterholz MD Decl. ¶ 305; Lacouture/Ruesterholz DC Decl. ¶ 294; LacoutureRuesterholz WV Decl. ¶ 291. Verizon also provides CLECs in all three jurisdictions with access to its Toll Free, Line Information, and Calling Name databases. See Lacouture/Ruesterholz MD Decl. ¶¶ 309,312, 317; LacoutureRuesterholz DC Decl. ¶¶ 297,300,305; LacoutureRuesterholz WV Decl. ¶¶ 294,297,302. In 2002, Verizon processed more than one billion queries for its Toll Free database in Maryland, and hundreds of millions **of** such queries in the District and West Virginia; more than a hundred million queries for its Line Information database in the **former** Bell Atlantic South states (Delaware, Pennsylvania, New Jersey, Maryland, Virginia, West Virginia, and the

District of Columbia); and hundreds of millions of queries for its Calling Name databases in the former Bell Atlantic South states. See LacoutureRuesterholz MD Decl. ¶¶ 310, 314,318; LacoutureRuesterholz DC Decl. ¶¶ 298,302,306; LacoutureRuesterholz WV Decl. ¶¶ 295, 299,303. In addition, **as** of September 2002, approximately 20 CLECs in Maryland and two in the District (though none in West Virginia) were using Verizon's Local Number Portability database. See LacoutureRuesterholz MD Decl. ¶ 322; LacoutureRuesterholz DC Decl. ¶ 310; Lacouture/Ruesterholz WV Decl. ¶ 307.[59]

As in Verizon's 271-approved states, Verizon also provides competing carriers in Maryland, the District, and West Virginia with access to its Service Management System database, which enables competitors to enter, modify, or delete entries in Verizon's call-related databases. See Lacouture/Ruesterholz MD Decl. ¶ 324; LacoutureRuesterholz DC Decl. ¶ 312; LacoutureRuesterholz WV Decl. ¶ 309. In addition, CLECs may obtain access to Verizon's Service Management System/Service Creation Environment, which enables them to create and test their own Advanced Intelligent Network ("AI"')-based telecommunications services. See LacoutureRuesterholz MD Decl. ¶ 325; Lacouture/Ruesterholz DC Decl. ¶ 313; LacoutureRuesterholz WV Decl. ¶ 310.

H. Number Portability (Checklist Item 11).

Verizon has implemented long-term number portability ("LNP") in all of its end offices in Maryland, the District, and West Virginia. See Lacouture/Ruesterholz MD Decl. ¶ 329;

[59] During the course of the Maryland proceeding, one CLEC (Starpower) claimed that Verizon billed it for signaling links at special access rates, rather than at UNE rates. See LacoutureRuesterholz MD Decl. ¶ 308. As the Commission has repeatedly held, however, billing disputes such as this are "not appropriately resolved in a section 271 proceeding." Vermont Order ¶ 58. In any event, Verizon's billing was entirely appropriate because Starpower ordered those links **as** a special access. See Lacouture/Ruesterholz MD Decl. ¶ 308. Verizon also is willing to work with Starpower to convert its signaling links to UNEs, assuming they qualify for conversion. See id.

LacoutureRuesterholz DC Decl. ¶ 317; LacoutureRuesterholz WV Decl. ¶ 314. Verizon uses the same processes and procedures to provide number portability in these three jurisdictions as it uses in its 271-approved states. See Lacouture/Ruesterholz MD Decl. ¶ 328; Lacouture/Ruesterholz DC Decl. ¶ 316; Lacouture/Ruesterholz WV Decl. ¶ 313; Virginia Order ¶ 191 (finding that Verizon's provision of number portability satisfies the checklist); Pennsylvania Order ¶ 120 (same); New Hampshire/Delaware Order ¶ 134 (same); New Jersey Order ¶ 164 (same); Massachusetts Order ¶ 222 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same).

Through September 2002, Verizon has provided LNP to 27 CLECs in Maryland on approximately 250,000 telephone numbers, to 18 CLECs in the District on approximately 171,000 telephone numbers, and to approximately five CLECs in West Virginia on approximately 47,000 telephone numbers. See LacoutureRuesterholz MD Decl. ¶ 330; LacouturelRuesterholz DC Decl. ¶ 318; Lacouture/Ruesterholz WV Decl. ¶ 315.[60] In all three jurisdictions, Verizon has met the due date on more than 95 percent of the orders for LNP that were performed on a stand-alone basis, and on approximately 97 percent or more of the LNP orders that were performed in conjunction with hot cuts. See Lacouture/Ruesterholz MD Decl. ¶ 331; LacoutureRuesterholz DC Decl. ¶ 319; Lacouture/Ruesterholz WV Decl. ¶ 316.

[60] Verizon also continues to maintain interim number portability ("INP") capabilities for CLECs, though it is no longer taking orders for INP. See Lacouture/Ruesterholz MD Decl. ¶ 329; LacouturelRuesterholz WV Decl. ¶ 314. Where CLECs have existing INP arrangements, Verizon is converting those arrangements to LNP on a mutually agreed-upon schedule. See LacoutureRuesterholz MD Decl. ¶ 329; LacoutureRuesterholz WV Decl. ¶ 314. Through September 2002, Verizon continues to provide INP through approximately 26 INP arrangements in Maryland and through 30 INP arrangements in West Virginia. See Lacouture/Ruesterholz MD Decl. ¶ 329; Lacouture/Ruesterholz WV Decl. ¶ 314.

I. Local Dialing Parity (Checklist Item 12).

Venzon provides local dialing parity throughout its service areas in Maryland, the District, and West Virginia using substantially the same processes and procedures as in its 271-approved states. See LacoutureRuesterholz MD Decl. ¶ 332; LacoutureRuesterholz DC Decl. ¶ 320; Lacouture/Ruesterholz WV Decl. ¶ 317; Virginia Order ¶ 193 (finding that Verizon's provision of local dialing parity satisfies the checklist); Pennsylvania Order ¶ 120 (same); New Hampshire/Delaware Order ¶ 135 (same); New Jersey Order ¶ 164 (same); Massachusetts Order ¶ 222 (same); Rhode Island Order ¶ 97 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same). In all three jurisdictions, once local calls from competing carriers reach Verizon's network, they are treated the same as any call that originates on Verizon's own network. See LacoutureiRuesterholz MD Decl. ¶ 333; LacoutureRuesterholz DC Decl. ¶ 321; LacoutureRuesterholz WV Decl. ¶ 318. Accordingly, no differences exist in dialing delays, call completion, or transmission quality between calls made by CLECs' customers and calls made by Verizon's customers. See LacoutureRuesterholz MD Decl. ¶ 333; Lacouture/Ruesterholz DC Decl. ¶ 321; Lacouture/Ruesterholz WV Decl. ¶ 318. In the first nine months of 2002, Verizon exchanged approximately 16 billion minutes of traffic with CLECs in Maryland, approximately 5.5 billion minutes of traffic with CLECs in the District, and approximately one billion minutes of traffic with CLECs in West Virginia over local interconnection trunks on calls that were completed with dialing parity. See LacoutureRuesterholz MD Decl. ¶ 336; LacoutureRuesterholz DC Decl. ¶ 324; Lacouture/Ruesterholz WV Decl. ¶ 321. In addition, while intraLATA toll dialing parity is not a checklist requirement, Venzon has implemented intraLATA toll dialing parity in Maryland, the District, and West Virginia pursuant to the requirements of the state commissions in those jurisdictions. See Lacouture/Ruesterholz MD Decl. ¶ 337; Lacouture/Ruesterholz DC Decl. ¶ 325; LacoutureRuesterholz WV Decl. ¶ 322.

J. Reciprocal Compensation (Checklist Item **13).**

Verizon is providing reciprocal compensation for transportation and termination of local calls to competing carriers in Maryland, the District, and West Virginia. See Lacouture/Ruesterholz MD Decl. ¶ 338; LacoutureRuesterholz DC Decl. ¶ 326; Lacouture/Ruesterholz WV Decl. ¶ 325. **As** of September 2002, Verizon was paying reciprocal compensation to some 22 CLECs, eight cellular providers, and six paging companies in Maryland. See Lacouture/Ruesterholz MD Decl. ¶ 340.6' **As** of that same date, Verizon was paying reciprocal compensation to some nine CLECs, four cellular providers, and five paging companies in the District. See Lacouture/Ruesterholz DC Decl. ¶ 328. In West Virginia, Verizon was paying reciprocal compensation to some five CLECs, 11 cellular providers, and one paging company as of September 2002. See Lacouture/Ruesterholz WV Decl. ¶ 327.

K. Resale (Checklist Item **14).**

In Maryland, the District, and West Virginia, Verizon makes available for resale at wholesale rates established by the state commissions in those states all of the telecommunications services that Verizon offers at retail to subscribers that are not telecommunications carriers. See Lacouture/Ruesterholz MD Decl. ¶ 341;

---

[61] The Commission has found that intercarrier compensation for Internet-bound traffic is not subject to 47 U.S.C. § 251(b)(5), which means that compensation for such traffic is not an issue under the checklist. See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Intercarrier Compensation for ISP-Bound Traffic, Order on Remand and Report and Order, 16 FCC Rcd 9151 (2001), remanded, WorldCom. Inc. v. FCC, 288 F.3d 429 (D.C. Cir. 2002); 47 U.S.C. § 271(c)(2)(B)(xiii); id. § 252(d)(2); Pennsylvania Order ¶ 119; Connecticut Order ¶ 67; Massachusetts Order ¶ 215; Kansas/Oklahoma Order ¶ 251. Consistent with this precedent, there is no need to address here the billing disputes that a few carriers in the District and West Virginia raised regarding reciprocal compensation for Internet-bound traffic, which in **any** event are being addressed in separate proceedings in those jurisdictions. See Lacouture/Ruesterholz DC Decl. ¶ 329; Lacouture/Ruesterholz WV Decl. ¶¶ 328-329.

LacoutureRuesterholz DC Decl. ¶ 330; LacoutureRuesterholz WV Decl. ¶ 330.[62] In all three jurisdictions, Verizon makes services available for resale in the same manner and using essentially the same processes and procedures as in its 271-approved states. See LacouturelRuesterholzMD Decl. ¶ 341; LacoutureRuesterholz DC Decl. ¶ 330; Lacouture/Ruesterholz WV Decl. ¶ 330; Virginia Order ¶ 193 (finding that Verizon's provision of resale satisfies the checklist); Pennsylvania Order ¶¶ 93-95 (same); New Hampshire/Delaware Order ¶ 135 (same); New Jersev Order ¶ 161 (same); Massachusetts Order ¶¶ 217-221 (same); Rhode Island Order ¶ 94 (same); Vermont Order ¶ 59 (same); Maine Order ¶ 52 (same). Through September 2002, Verizon has provided approximately 111,000 resold lines in Maryland (61,000 business lines and 48,000 residential lines); approximately **14,000** resold lines in the District (8,000 business lines and 6,500 residential lines); and approximately 13,000 resold lines in West Virginia (8,600 business lines and 4,000 residential lines). See Lacouture/Ruesterholz MD Decl. ¶ 342; Lacouture/Ruesterholz DC Decl. ¶ 331; LacoutureRuesterholz WV Decl. ¶ 331.

Verizon provides services for resale on time, when CLECs request them. From August through October, Verizon met more than 99 percent of its installation appointments for CLECs that did not require the dispatch of a Verizon technician in Maryland, the District, and West Virginia, and more than 95 percent of its installation appointments that did require a dispatch,

[62] The Maryland PSC established a 19.87-percent discount that applies to both business and residential lines and that is the same regardless of whether a carrier obtains operator and directory assistance from Verizon or provides it itself. See Roberts/Garzillo/Prosini Decl. ¶ 62. The District of Columbia PSC has established a 12.72-percent discount for residential and business lines with Verizon's OS/DA, and a 14.79-percent discount for residential and business lines without these features. See Johns/Garzillo/Prosini Decl. ¶ 44. The West Virginia PSC has a 15.05-percent discount for residential and business lines with Verizon's OS/DA, and a 17.84-percent discount for residential and business lines without these features. See Given/Garzillo/Sanford Decl. ¶ 61.

and in all three jurisdictions, Verizon's performance for CLECs has consistently been equal to or better than for the retail comparison group. See LacoutureRuesterholz MD Decl. ¶ **349;** LacoutureRuesterholz DC Decl. ¶ **338;** LacoutureRuesterholz WV Decl. ¶ **338.**

Verizon also is installing resold lines with a high level of quality. The percentage of troubles reported on CLEC resold lines was lower than for the retail comparison group from August through October in Maryland, and in two out of those three months in West Virginia where the repeat trouble report rate for the three months as a whole was only slightly higher for CLECs than for the retail comparison group. See Lacouture/Ruesterholz MD Decl. ¶ **351;** LacoutureRuesterholz WV Decl. ¶ **339.** In the District, the repeat trouble report was only slightly higher for CLECs than for the retail comparison group. Lacouture/Ruesterholz DC Decl. ¶ **340.** Moreover, on the very small percentage of resold lines that experience troubles in those three jurisdictions, Verizon repairs them in a timely and nondiscriminatory manner. See LacoutureRuesterholz MD Decl. ¶¶ **354-357;** Lacouture/Ruesterholz DC Decl. ¶¶ **343-346;** LacoutureRuesterholz WV Decl. ¶¶ **342-343.**

Finally, Verizon offers for resale at a wholesale discount those **DSL** services that **are** subject to a discount under the Commission's rules. See LacoutureRuesterholz MD Decl. ¶¶ **358-359;** Lacouture/Ruesterholz DC Decl. ¶¶ 347-348; LacouturelRuesterholz WV Decl. ¶¶ 346-347. Verizon makes available in Maryland, the District, and West Virginia the same "DSL Over Resold Lines" service that Verizon provides in Virginia, Pennsylvania, Connecticut, Rhode Island, Vermont, and Maine, see LacoutureRuesterholz MD Decl. ¶ **341;** LacoutureRuesterholz DC Decl. ¶ **330;** LacoutureRuesterholz WV Decl. ¶ **330,** where the Commission found that Verizon's offering satisfies the requirements of the Act, see Virginia Order ¶ **193;** Pennsylvania Order ¶ **95;** New Hampshire/Delaware Order ¶ 135; Connecticut

Order ¶ 27; Rhode Island Order 795; Vermont Order ¶ 59; Maine Order ¶ 52; New Jersey Order ¶ 161. Verizon uses the same checklist-compliant processes and procedures to provide this new service as it uses in those states. See Lacouture/Ruesterholz MD Decl. ¶ 358; Lacouture/Ruesterholz DC Decl. ¶ 347; Lacouture/Ruesterholz WV Decl. ¶ 346. And, based on experience throughout Verizon's region, Verizon will be able to handle whatever limited demand can reasonably be expected to emerge for this new service. See LacoutureRuesterholz MD Decl. ¶ 358; Lacouture/Ruesterholz DC Decl. ¶ 347; Lacouture/Ruesterholz WV Decl. ¶ 346.[63]

L. Operations Support Systems.

Verizon provides CLECs operating in Maryland, the District, and West Virginia with access to various checklist items through the same operations support systems serving Virginia, including the same common interfaces that are used in all of Verizon's 271-approved states. See McLean/Webster Decl. ¶ 5. The Commission has found that these OSS are in place, fully operational, handling commercial volumes, and satisfy the requirements of the Act in all respects. See Virginia Order ¶ 22; see also Kansas/Oklahoma Order ¶ 111 (finding that two different states may "share the use **of** a single **OSS . . .** : a common set of processes, business rules, interfaces, systems"). The Commission has found that Verizon's interfaces and gateways satisfy the requirements of the Act on ***ten*** separate occasions. See Virginia Order ¶ 22; Pennsylvania Order ¶¶ 11-12; New Hampshire/Delaware Order ¶ 95; New Jersey Order ¶¶ 74-75; Massachusetts Order ¶¶ 50, 70, 90, 95, 97, 102, 114; Rhode Island Order ¶¶ 58-71; Vermont Order ¶¶ 39-40; Maine Order ¶¶ 35-36; New York Order ¶ 82; Connecticut Order ¶ 53.

[63] During the proceedings in Maryland and the District, WorldCom complained that Verizon does not provide DSL service to a customer that switches its voice service to a CLEC. **As** the Commission has held, this is fully consistent with the requirements of the Act. See Texas Order ¶ 330.

As described above, Verizon has always provided service in Maryland, the District, and West Virginia using the underlyng ***OSS*** that also serve Virginia. See McLean/Webster Decl. ¶ 13. Verizon also provides CLECs in these three jurisdictions with access to the same interfaces and gateway systems used in Virginia for pre-ordering, ordering, maintenance and repair, and billing. See id. ¶ 8. Verizon provisions orders for CLECs in Maryland, the District, and West Virginia using the same processes and procedures — and from the same work centers — as in Virginia. See id. Verizon also provides competing carriers in all three jurisdictions with the exact same technical support, including the exact same change management process, to help them use Verizon's OSS. See id. ¶¶ 171, 174.

As the Commission has found, these systems already were subject to an "independent third-party test" that was "broad" in scope, employed a "military-style" test standard, and provides "meaningful evidence" of Verizon's OSS readiness. Virginia Order ¶¶ 25-27. And, of course, this Commission previously concluded that these same systems comply fully with the checklist. See Virginia Order ¶ 22.

This conclusion is as obviously correct today as it was just seven weeks ago. As was the case at the time of the Virginia application, Verizon's systems are successfully handling large commercial volumes. For example, Verizon's pre-ordering interfaces processed more than 29 million transactions across the former Bell Atlantic footprint in 2001, including 1.8 million in Maryland, 475,000 in the District, and 228,000 in West Virginia. See McLean/Webster Decl. ¶ 30. In the first ten months of 2002, Verizon's pre-ordering interfaces processed more than 26.8 million transactions across the former Bell Atlantic footprint, including 1.9 million in Maryland, 440,000 in the District, and 205,000 in West Virginia. See McLean/Webster Decl. ¶ 30. Verizon's ordering interfaces processed more than 10.3 million LSRs in 2001 across the former

Bell Atlantic footprint, including more than 530,000 in Maryland, 135,000 in the District, and nearly 60,000 in West Virginia. See id. ¶ 55. In the first ten months of 2002, Verizon's ordering interfaces processed more than 8.9 million across the former Bell Atlantic footprint, including more than 570,000 in Maryland, over 130,000 in the District, and more than 55,000 in West Virginia. See id. ¶ 55.

Moreover, Verizon engaged PwC to conduct an assessment to an attestation standard to verify that Verizon's systems, processes, and procedures in Maryland, the District, and West Virginia are the same as those used in Virginia. See McLean/Webster Decl. ¶ 9; see also Rhode Island Order ¶ 60 (relying on comparable "sameness" test); Vermont Order ¶ 40 (same); Maine Order ¶ 36 (same); Kansas/Oklahoma Order ¶¶ 3, 107 n.303 (same). PwC verified that there is one unique set of software coding and configuration installed on one or more computer servers that support all states in the former C&P territory, and that the personnel and work centers throughout that territory use the same processes. See McLedWebster Decl. ¶ 9. PwC also confirmed that the data Verizon uses in its performance measurement calculations are consistent across the former C&P states, and that the processes and procedures used to calculate these measurements are the same. See id. ¶ 9.

1. Pre-Ordering.

Verizon provides CLECs in Maryland, the District, and West Virginia with the same three electronic pre-ordering interfaces that it does in its 271-approved states and throughout the former Bell Atlantic service areas. See McLedWebster Decl. ¶ 20. The first is a Web GUI that can be used with a personal computer. See id. The second is an application-to-application interface based on the industry standard Electronic Data Interchange ("EDI") protocol. See id. The third is another application-to-application interface known as Common Object Request Broker Architecture ("CORBA"). See id. ¶ 23.

Verizon currently offers two industry-standard versions of the Local Service Ordering Guidelines ("LSOG) for each of the pre-ordering interfaces: LSOG 4 and LSOG 5. LSOG 4 was in place in Massachusetts, Connecticut, Pennsylvania, Rhode Island, Vermont, Maine, New Jersey, New Hampshire, Delaware, and Virginia when the Commission approved Verizon's applications for those states; LSOG 5 is a more recent version **of** these standards and guidelines and was in place in Virginia, New Hampshire, Delaware, Rhode Island, Vermont, Maine, and New Jersey when the Commission approved Verizon's application in those states. See id. ¶¶ 21-22.[64] CLECs are using both the Web GUI and EDI interfaces to submit pre-ordering transactions in Maryland, the District, and West Virginia, and a number of CLECs are certified to use CORBA to perform pre-ordering transactions with Verizon, which enables them to use it in any former Bell Atlantic state. See id. ¶ 20.[65]

Verizon's pre-ordering interfaces, which are the same throughout the former Bell Atlantic service areas, already handle large commercial volumes. For example, in 2001, Verizon processed more than 29 million pre-ordering transactions across the former Bell Atlantic footprint, including 1.8 million in Maryland, 475,000 in the District, and 228,000 in West Virginia. See McLean/Webster Decl. ¶ 30. In the first ten months of 2002, Verizon processed another 26.8 million transactions across the former Bell Atlantic footprint, including 1.9 million

[64] As Verizon has explained in previous applications, Verizon implemented this new standard pursuant to the change management process originally developed in New York and now applied throughout the former Bell Atlantic region. This process incorporated input from CLECs and enabled them to test the release before it was implemented in production. See McLean/Webster Decl. ¶¶ 21-22. Because Verizon supports two versions of a pre-ordering interface, as specified in the change management process, CLECs can make the transition to new versions on a schedule that is convenient for them within a reasonable time frame. See id. Verizon also will follow the change-management process to implement LSOG 6, which is scheduled to take place in February 2003. See id. ¶¶ 22, 179.

[65] CLECs can integrate Verizon's pre-ordering EDI and CORBA interfaces with their own back-end systems and with Verizon's EDI ordering interface. See McLean/Webster Decl. ¶ 25; Massachusetts Order ¶ 52; New York Order ¶¶ 137-138.

in Maryland, 440,000 in the District, and 205,000 in West Virginia. See McLean/Webster Decl. ¶ 30.

Even at these large and increasing volumes, the performance of Verizon's pre-ordering systems has remained excellent. From August through October, Verizon generally met the response-time standards for all types of pre-ordering transactions in Maryland, the District, and West Virginia, including the separate standards for providing "parsed" Customer Service Records. See id. ¶ 32; Massachusetts Order 753 & n.155.[66] During that same period, Verizon's EDI, CORBA, and Web GUI pre-ordering interfaces also consistently met the 99.5-percent availability standard. See McLean/Webster Decl. ¶ 34; Massachusetts Order ¶ 53 & n.154.[67] Moreover, during its evaluation of Verizon's **OSS** in Virginia, KPMG found that Verizon satisfied all of the test points with respect to pre-ordering, and because the systems in Maryland, the District, and West Virginia are the same as those in Virginia, KPMG's conclusion applies with equal force here. See McLean/Webster Decl. ¶ 36; KPMG Final Report at 136-43, 166-82; Rhode Island Order ¶¶ 59-60.[68]

---

[66] There were only three instances of Verizon missing a standard during this period. The first involved a single transaction (Telephone Number Availability & Reservation) over a single interface (EDI) in one month (October) in West Virginia. See McLean/Webster Decl. ¶ 32. There were only two of these transactions in West Virginia in October — out of more than 15,500 pre-ordering transactions — and the average response time was fewer than six seconds longer than the benchmark. See id. The second likewise involved a single transaction (Address Validation) over a single interface (CORBA) in one month (October) in the District. See id. ¶ 32. During that month, Verizon's average response time was less than one second longer than the benchmark, and Verizon met the benchmark in the District in the other two months (August and September). See id. The third (Percent Timeouts) involved a single unscheduled four-hour outage in September of one of Verizon's servers supporting the Web GUI interface and affected a tiny percentage of transactions submitted in all three jurisdictions during that month. See id.

[67] During one day in October 2002, some CLECs had difficulty accessing the Web GUI due to an intermittent problem with one of Verizon's servers. Verizon provided these CLECs with an alternative path to access the Web GUI, which resolved this temporary problem. See McLean/Webster Decl. ¶ 35.

[68] In the West Virginia state proceedings, one CLEC claimed that the Customer Service

2. Ordering.

Verizon provides CLECs serving end users in Maryland, the District, and West Virginia with the same two electronic ordering interfaces that it provides in its 271-approved states, both of which are currently used by CLECs in these states. See McLedWebster Decl. ¶ 48. The first is the same Web **GUI** that is available for pre-ordering. Seed Massachusetts Order ¶ 74. The second is *an* EDI ordering interface. See McLean/Webster Decl. ¶ 48; Massachusetts Order 774.

Like the pre-ordering interfaces, the ordering interfaces are available in ***two*** versions: LSOG **4** (which was in place when Verizon's Massachusetts, Pennsylvania, Rhode Island, Vermont, Maine, New Jersey, Connecticut, New Hampshire, Delaware, and Virginia applications were approved) and LSOG 5 (which is based on a more recent version of those standards and was in place when Verizon's Virginia, New Hampshire/Delaware, Rhode Island, Vermont, Maine, and New Jersey applications were approved). See McLedWebster Decl. ¶¶ 22, 49-50.[69] The Commission has found that Verizon's ordering interfaces satisfy the requirements of section 271. See, e.g., Virginia Order ¶ 22; Pennsylvania Order ¶ 12; New Hampshire/Delaware Order ¶ 95; New Jersey Order ¶ 74; Massachusetts Order ¶ 70; Rhode Island Order **166;** Vermont Order ¶ 39; Maine Order ¶ 35.

Verizon's ordering interfaces are handling commercial volumes. In 2001, Verizon processed more than 530,000 LSRs in Maryland, nearly 135,000 LSRs in the District, and nearly 60,000 LSRs in West Virginia, and more than **10.3** million in the former Bell Atlantic states as a

---

Records ("CSRs") it received from Verizon were missing certain information. Verizon could not identify any missing information for **two** of the three examples provided **by** that CLECs, and with respect to the third example Verizon implemented a system fix on September 4,2002. See McLean/Webster Decl. ¶ 33.

[69] **As** noted above, Verizon intends to implement LSOG ***6*** in February 2003, and will do ***so*** consistent with the change-management process. See McLean/Webster Decl. ¶¶ 50, 179.

whole. See McLean/Webster Decl. ¶ 55. From January through October 2002, Verizon processed more than 570,000 LSRs in Maryland, more than 130,000 LSRs in the District, more than 55,000 LSRs in West Virginia, and more than 8.9 million in the former Bell Atlantic states as a whole. See id. Moreover, as part of its *OSS* evaluation in Virginia, KPMG tested Verizon's ability to process normal, peak, and stress order volumes, and found that Verizon satisfied all of the test criteria. See id. ¶ 55; KPMG Final Report at 166-96.

Even at these large and increasing volumes, Verizon performs the various ordering functions on a timely basis. From August through October 2002, Verizon's on-time performance for returning confirmation, reject, and completion notifiers generally exceeded the 95-percent benchmark for both UNE and resale orders, and across almost all order-type subcategories in Maryland, the District, and West Virginia. See McLean/Webster Decl. ¶¶ 68-69; Rhode Island Order ¶ 66 & n.181.[70] These are substantially the same "strict benchmark standards" that apply to Verizon's performance in Virginia, Massachusetts, New York, and Pennsylvania. New York Order ¶¶ 164, 180; see Virginia Order ¶ 2; Massachusetts Order ¶ 71; Pennsylvania Order ¶ 3.

Verizon also processes orders accurately, as evidenced by its performance on the Service Order Accuracy measurements. With respect to orders that required manual intervention, Verizon's order accuracy performance in Maryland and West Virginia met the 95-percent benchmark for UNE loop orders, from August through October, and either met or was very close to the 95-percent benchmark for resale and UNE platform orders during these same months. See

[70] In most of the subcategories for which Verizon's reported performance is below the 95-percent benchmark, Verizon generally missed fewer than five orders in each case, which means that the volumes involved are too small to provide meaningful results. See McLean/Webster Decl. ¶ 68. A few of the other subcategories that Verizon missed involve a 72-hour benchmark for Verizon to conduct a facilities check. This is an insufficient amount of time to perform this labor-intensive activity, and Verizon and CLECs are currently discussing changes to the standard for these measurements in the New York Carrier-to-Camer Working Group. See id.; Guerard/Canny/DeVito Decl. ¶ 42.

McLean/Webster Decl. ¶ **70.** Overall, these results are comparable to Verizon's results in Massachusetts and Pennsylvania at the time the Commission approved Verizon's applications in those states. See id. ¶ **71;** Virginia Order ¶¶ **22, 24** & n.64; Massachusetts Order ¶ 81 & n.251; Pennsylvania Order ¶ 49 & n.190.

Verizon's OSS also are capable of "flowing through" a large percentage of CLEC orders. Indeed, Verizon's total flow-through results in Maryland, the District, and West Virginia — both for UNE and resale orders — are comparable to those at the time of Verizon's Virginia, New York, Pennsylvania, Maine, and New Jersey applications. See McLean/Webster Decl. ¶ 56. Verizon's achieved flow-through rate for all modes of entry also is high in Maryland, the District, and West Virginia. See Pennsylvania Order ¶ 48 ("we do not specifically require Verizon to provide data on its achieved flow-through rate to determine that Verizon's ***OSS*** are capable of offering high flow-through").[71] From August through October, the achieved flow-through rate exceeded 95 percent for resale orders in all three jurisdictions. % McLean/Webster Decl. ¶ 62. During that same period, the achieved flow-through rate **for** UNE orders increased from 89 percent to nearly 96 percent in Maryland, from more than 93 percent to more than 95 percent in the District, and from 59 percent to nearly 89 percent in West Virginia. See id. Of course, **as** in Verizon's 271-approved states, the total flow-through rates in Maryland, the District, and West Virginia continue to vary by carrier, demonstrating that Verizon's systems are significantly better than the aggregated results suggest on their face. See McLean/Webster Decl. ¶¶ 60-61; Massachusetts Order ¶ 78; New York Order ¶ 166.

Finally, Verizon's performance in returning order status notifiers to CLECs is strong. From **August** through October, Verizon generally exceeded the 95-percent benchmark for

[71] The Achieved Flow Through measurements track the percentage of orders that are designed to flow through that actually do flow through. See Guerard/Canny/DeVito Decl. ¶ 59.

returning provisioning and billing completion notifiers **on** time in Maryland, the District, and West Virginia. See McLean/Webster Decl. ¶¶ 83-87; Massachusetts Order ¶ 84; Rhode Island Order ¶ 66 & n.181.[72] Verizon also has two methods for informing CLECs **of** orders that are in jeopardy, which are the same methods that it provided at the time the Commission approved Verizon's Virginia, Massachusetts, Pennsylvania, Rhode Island, Vermont, **and** Maine applications. See McLean/Webster Decl. ¶¶ 73-78; Virginia Order ¶ 22; Massachusetts Order ¶ 85; Pennsylvania Order ¶ 50; Rhode Island Order ¶¶ 67-68; Vermont Order ¶ 42; Maine Order ¶ 35.

3. Provisioning.

Verizon provisions CLEC orders in Maryland, the District, and West Virginia **on** a nondiscriminatory basis. See McLean/Webster Decl. ¶ 127. As in the other states **for** which Verizon has received section 271 authorization, there are no separate provisioning interfaces because provisioning is essentially internal to Verizon once an order is submitted. See id. ¶ 124. Indeed, the systems and processes for most CLEC orders are the same **as** those used to provision Verizon's retail orders. See id. ¶ 125. **As** the Commission has concluded, these systems "provide[] parity in provisioning competitors' orders as compared to [Verizon's] retail orders." Massachusetts Order ¶ 90.

4. Maintenance and Repair.

Verizon provides CLECs in Maryland, the District, and ***West*** Virginia with access to the same *two* maintenance and repair interfaces that it provides in its 271-approved states and the rest of the former Bell Atlantic service areas: the Web GUI and **an** electronic bonding interface.

[72] The one exception involved a single metric in a single month (September) in the District that was due to an incident with a back-end system that caused some provisioning completion notices from being correctly formatted and, therefore, prevented them from being sent on time. See McLean/Webster Decl. ¶ 85. Verizon promptly corrected the problem. See id.

See McLean/Webster Decl. ¶ 128. From August through October, more than 35 CLECs in Maryland, approximately 20 in the District, and more than 10 in West Virginia used the Web GUI for maintenance and repair, and three CLECs in Maryland, three in the District, and one in West Virginia used the EBI for maintenance and repair. See McLean/Webster Decl. ¶ 129.

Competing carriers in all three jurisdictions use Verizon's maintenance and repair interfaces in commercially significant volumes. For example, from August through October, CLECs used RETAS — the maintenance and repair system accessed by the Web GUI throughout the former Bell Atlantic footprint — to perform approximately 250,000 maintenance and repair transactions per month across the former Bell Atlantic footprint, including approximately 2,800 maintenance transactions per month in Maryland, approximately 560 maintenance transactions per month in the District, and approximately 350 maintenance transactions per month in West Virginia. See id. ¶ 137.

Verizon's maintenance and repair systems process trouble reports from CLECs in substantially the same time and manner as Verizon processes reports for its own retail customers. From August through October, Verizon consistently exceeded the established standards for responding to virtually all types of maintenance and repair requests that CLECs submitted using the Web GUI in Maryland, the District, and West Virginia. See id. ¶ 138; see also Massachusetts Order ¶ 96 (relying on comparable or lesser performance); New York Order ¶ 219 (same).[73] Moreover, Verizon satisfied all but two of the test criteria related to maintenance and repair in

[73] There were only two exceptions. First, in October, Verizon missed the Test Trouble benchmark in West Virginia but only by less than three seconds, and Verizon met the benchmark in August and September in West Virginia and in all three months in Maryland and the District. See McLean/Webster Decl. ¶ 138. Second, in September, Verizon missed the Modify Trouble benchmark in the District, but there was only one transaction that month and Verizon missed the benchmark by less than two seconds. See id. ¶ 138. Verizon met Modify Trouble benchmark in the District in August and September, and in all three months in Maryland and West Virginia.

the examination conducted by KPMG, and on those two issues the sample sizes were so small that the results were inconclusive. See McLedWebster Decl. ¶ 128; KPMG Final Report at 18, 291-366.

5. **Billing.**

Verizon uses the Virginia systems to generate billing information in Maryland, the District, and West Virginia. See McLedWebster Decl. ¶ 140.[74] These are the same systems that Verizon uses for its own retail operations in all three jurisdictions. See McLean/Webster Decl. ¶ 140. These systems accordingly handle substantial and growing commercial volumes. See id. ¶ 152; see also Maryland PSC December 16th Letter at 6. The Commission found that these systems "provide nondiscriminatory access to [Verizon's] billing functions," and that Verizon's "wholesale bills provide competing carriers . . . with a meaningful opportunity to compete." Virginia Order ¶¶ 39, 40; see also id. ¶ 42 (finding that Verizon's carrier bills are auditable by CLECs). The Commission also found that Verizon's "provision of service usage data through the [Daily Usage File] meets its obligations" under the Act. Id. ¶ 39. Moreover, KPMG "evaluated and found satisfactory all 75 test points regarding Verizon's billing systems in Virginia." Id.; see KPMG Final Report at 382-86, 405-08; McLeanlWebster Decl. ¶ 150; New Jersey Order ¶¶ 79, 124-125 (relying in part on similar test results by KPMG).

As the Commission has previously recognized, the billing information that competing carriers use to render bills to their own customers consists of the usage data collected by

---

[74] **As** in Virginia, Verizon principally uses the expressTRAK and Carrier Access Billing System ("CABS") to generate billing information in Maryland, the District, and West Virginia. See McLean/Webster Decl. ¶ 140; Virginia Order 739 & n.114. Verizon uses expressTRAK for billing related both to its retail products, as well **as** for its wholesale products involving resale services, UNE-platforms, unbundled loops, and unbundled switching ports — all of the products for which CRIS previously was used. See McLeanlWebster Decl. ¶ 140. Verizon continues to use CABS for billing related to other unbundled network elements, as well as collocation, access services, and other carrier-settlement functions. See id.